

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 17-mc-151-LPS

**RUSORO’S RESPONSE TO SPECIAL MASTER’S RESPONSE TO THE
COURT’S INCLINATIONS REGARDING SALE HEARING**

Rusoro Mining Ltd. (“Rusoro”) respectfully submits this response to the Special Master’s submission dated August 16, 2025 (D.I. 2092), responding to this Court’s August 14, 2025 Order adjourning the August 18, 2025 Sale Hearing and setting forth its Inclinations (D.I. 2056) (the “Inclinations Order”). In its opening brief in response to the Court’s Inclinations Order, the Special Master recommended that the Sale Hearing be scheduled for October 21-23, 2025. D.I. 2092 at 2. While Rusoro understands the scheduling concerns laid out by the Special Master and generally agrees that the Court’s decision to issue a continuance of the Sale Hearing was a prudent and necessary one, Rusoro believes that the schedule can be efficiently compressed and further streamlined, while still allowing all interested parties a full and fair opportunity to develop and state their positions on any Final Recommended Bid, to enable the Sale Hearing to take place sooner than October 21, 2025.

Dated: August 17, 2025

Respectfully submitted,

DLA Piper LLP (US)

By: /s/ R. Craig Martin
R. Craig Martin (#005032)
1201 North Market Street
Suite 2100
Wilmington, DE 19801
Telephone: 302-468-5655
Fax: 302-778-7834
craig.martin@us.dlapiper.com

- and -

James E. Berger (*pro hac vice*)
Charlene C. Sun (*pro hac vice*)
Joshua S. Wan (*pro hac vice*)
Alice A. Gyamfi (*pro hac vice* pending)
1251 Avenue of the Americas
New York, NY 10020
Telephone: 212-335-4715
Fax: 212-884-8715
James.berger@us.dlapiper.com
Charlene.sun@us.dlapiper.com
Joshua.wan@us.dlapiper.com
Alice.gyamfi@us.dlapiper.com

Attorneys for Rusoro Mining Ltd.